

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

---

MARK MARKHAM, individually and on behalf  
of all others similarly situated,

Plaintiff,

Civil Action No.: 19-cv-00232

v.

Hon. Janet T. Neff

NATIONAL GEOGRAPHIC PARTNERS LLC,

Defendant.

---

Philip L. Fraietta, Esq.

Joseph I. Marchese, Esq.

**BURSOR & FISHER, P.A.**

Counsel for Plaintiff Mark Markham

888 Seventh Avenue

New York, NY 10019

Tel: 646-837-7150

Fax: 212-989-9163

[pfraietta@bursor.com](mailto:pfraietta@bursor.com)

[jmarchese@bursor.com](mailto:jmarchese@bursor.com)

Frank S. Hedin, Esq.

**HEDIN HALL LLP**

Counsel for Plaintiff Mark Markham

1395 Brickell Avenue,

Suite 900

Miami, Florida 33131

Tel: 305-357-2107

Fax: 305-200-8801

[fhedin@hedinhall.com](mailto:fhedin@hedinhall.com)

Theodore W. Seitz (P60320)

Elisa J. Lintemuth (P74498)

**DYKEMA GOSSETT PLLC**

Attorneys for National Geographic  
Partners LLC

Dykema Gossett PLLC

300 Ottawa Ave. N.W., Suite 700

Grand Rapids, MI 49503

(616) 776-7500

[tseitz@dykema.com](mailto:tseitz@dykema.com)

[elintemuth@dykema.com](mailto:elintemuth@dykema.com)

---

**STIPULATED ORDER TO EXTEND TIME FOR NATIONAL GEOGRAPHIC TO  
RESPOND TO THE COMPLAINT IN CONJUNCTION WITH ITS  
PRE-MOTION CONFERENCE REQUEST**

Upon the stipulation of the parties, as is evidenced by the signatures of counsel below, and the Court being otherwise fully advised in the premises:

**IT IS ORDERED** that the deadline for Defendant to answer or otherwise respond to

Plaintiff's Complaint is extended to a date deemed proper by the Court, if necessary following a Pre-Motion Conference.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
Hon. Janet T. Neff

SO STIPULATED:

/s/ Philip L. Fraietta (w/permission)  
Frank S. Hedin  
HEDIN HALL LLP  
Attorney for Plaintiff  
1395 Brickell Ave., Ste 900  
Miami, FL 33131  
(305) 357-2107  
[fhedin@hedinhall.com](mailto:fhedin@hedinhall.com)

and

Philip L. Fraietta  
Joe Marchese  
BURSOR & FISHER, P.A.  
Attorney for Plaintiff  
888 Seventh Avenue  
New York, NY 10019  
(646) 837-7150  
[pfraietta@bursor.com](mailto:pfraietta@bursor.com)  
[jmarchese@bursor.com](mailto:jmarchese@bursor.com)

/s/ Elisa J. Lintemuth  
Theodore W. Seitz (P60320  
Elisa J. Lintemuth (P74498)  
**DYKEMA GOSSETT PLLC**  
Attorneys for National Geographic  
Partners LLC  
Dykema Gossett PLLC  
300 Ottawa Ave. N.W., Suite 700  
Grand Rapids, MI 49503  
(616) 776-7500  
[tseitz@dykema.com](mailto:tseitz@dykema.com)  
[elintemuth@dykema.com](mailto:elintemuth@dykema.com)